

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re:	:	
	:	Chapter 13
RALEIGH M. PORTER,	:	
	:	Bankruptcy No. 17-15557 (ELF)
Debtor.	:	
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**STIPULATION IN LIEU OF OBJECTION TO  
THE CITY OF PHILADELPHIA'S PROOF OF CLAIM**

Raleigh M. Porter (the "Debtor") and the City of Philadelphia (the "City"), to resolve the Debtor's informal objection to the City of Philadelphia's proof of claim, hereby agree to this Stipulation:

WHEREAS, the Debtor commenced the above-captioned bankruptcy case on August 15, 2017;

WHEREAS, February 9, 2018, the City filed a proof of claim, claim no. 4-1, in the amount of Five Thousand One Hundred and Two Dollars (\$5,102.00) (the "Claim");

WHEREAS, the Claim includes a judgment in the amount of Five Thousand Eighty-Two Dollars (\$5,082.00) entered in the Philadelphia Municipal Court for non-filed net profits tax (Case No. CE-08-11-73-0310) (the "Judgment");

WHEREAS, subsequent to the entry of the Judgment and the preparation of the Claim, the Debtor filed the missing return.

NOW, THEREFORE, in consideration of the background set forth above and the terms and conditions of this Stipulation as more fully set forth below, the Debtor and the City (collectively referred to as the "Parties") agree to be bound and do hereby stipulate as follows:

- I. The Parties wish to amicably resolve the Debtor's informal objection to the Claim;

2. The Parties agree the Judgment shall be reduced to Five Hundred Eighty-Two Dollars (\$582.00);

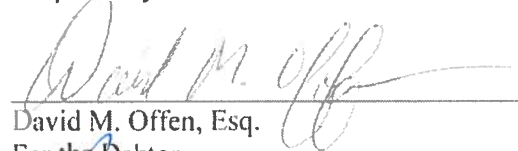
4. Within ten (10) days of this Stipulation receiving approval by this Honorable Court, the City shall amend its Claim to reflect the adjustment noted in paragraph 2 (the "Amended Claim").

5. Debtor's Plan shall provide for payment in full of the City's Amended Claim, including post-petition interest.

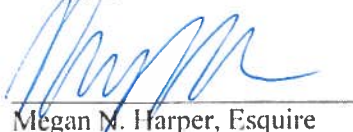
6. The terms of this Stipulation shall not be binding upon the City should this case be dismissed or converted to a case under Chapter 7 of the Bankruptcy Code.

Respectfully submitted,

Date: 3/21/2018

  
David M. Offen, Esq.  
For the Debtor

Date: 3/28/2018

  
Megan M. Harper, Esquire  
Deputy City Solicitor  
Attorney for the City of Philadelphia

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 2018, upon consideration of the Stipulation between Raleigh M. Porter and the City of Philadelphia, it is hereby ORDERED that the Stipulation is approved.

\_\_\_\_\_  
ERIC L. FRANK  
UNITED STATES BANKRUPTCY JUDGE